

REMARKS/ARGUMENTS

The Office Action mailed March 12, 2004, has been carefully considered.

Reconsideration in view of the following remarks is respectfully requested.

Claims 1, 5, 9, 21, 26 and 45 have been amended to further particularly point out and distinctly claim subject matter regarded as the invention. Support for these changes may be found in the specification, page 7, line 20 through page 8, line 3, and Fig. 1. The text of claims 2-4, 13, 22-24, 27-29, 46-48, 50-67 is unchanged, but their meaning is changed because they depend from amended claims.

New claims 68-71 have been added by this amendment and also particularly point out and distinctly claim subject matter regarded as the invention.

Claims 6-8, 10-12, 14-20, 25, 30-44 and 49 have been canceled, without prejudice or disclaimer of the subject matter contained therein.

The First 35 U.S.C. §102 Rejection

Claims 1, 2, 5, 13, 21, 25, 26, 45, 49, 51, 53-56, 58-61, and 63-67 stand rejected under 35 U.S.C. §102(b) as being allegedly anticipated by Perkins (U.S. Pat. No. 5,159,592). Referring to claim 1, the Office Action states that:

Perkins discloses a network access server (NAS) providing a connection to a user in a data communications network, said NAS being capable of communicating with a home gateway server (HGS), said NAS comprising: an IP address requester for requesting an IP address from the HGS (global Gateway or GW) on behalf of a user, without using a tunneling protocol, the HGS maintaining a pool of IP addresses for allocation to authorized

users associated with the NAS (local Gateway or GW) (e.g. abstract; Figures 2-5; col. 5, lines 50-65); an IP address relay for receiving an IP address allocated to the user from the HGS and for relaying the allocated IP address to the user (mobile unit) (e.g. abstract; Figures 2-5; col. 5, lines 50-65); and a memory coupled with said IP address requester and said IP address relay, said memory storing association between an identification of the user and the IP address allocated to the user (col. 5, lines 15-27).

Office Action, ¶ 2.

This rejection is respectfully traversed. According to the M.P.E.P., a claim is anticipated under 35 U.S.C. § 102(a), (b) and (e) only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.¹

Perkins does not teach “an HGS identifier for identifying the HGS associated with the home domain to which the request for an IP address is to be transmitted” according to claim 1 as amended. The Office Action equates the global gateway of Perkins to the “HGS” of the present invention. Office Action, ¶ 2.

However, a global gateway in Perkins is not “associated with the home domain.” In Perkins, a global gateway is primarily responsible for and hence associated with a mobile unit or a particular subset of mobile units. Col 8, lines 64-65. In fact, global gateways can be specified or identified by their mobile units. Col. 7 lines 16-17.

¹ Manual of Patent Examining Procedure (MPEP) § 2131. See also *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

To assign IP addresses to mobile units, Perkins allocates a plurality of IP addresses from various domains to a global gateway. Only after the global gateway receives IP addresses from various domain servers, does it dynamically assign the addresses to its requesting mobile units. Col. 4, lines 54-57.

Therefore, the global gateway of Perkins cannot be “associated with the home domain” because it receives IP address block allocations from various domain servers. Perkins faces the problems alluded to in the background section for the present application. Namely, both the global gateway and the domain servers must agree to share the same routing protocols, which may be undesirable. Furthermore, the approach is administratively complex and time consuming because any change in IP address allocation by the global gateway will result in a need to reconfigure all the domain access servers involved.

Claims 21, 26 and 45 also include similar distinctive features as claim 1. Applicants maintain claims 1, 21, 26 and 45 are now in a condition for allowance.

Referring to claim 5, the Office Action states that:

Perkins discloses an HGS (global gateway) identifier responsive to log-in information provided by the user, said HGS identifier (pseudo-network number) identifying an HGS to which the request for an IP address is to be transmitted (col. 8, lines 45-68).

Office Action, ¶ 4. Applicants disagree for the following reasons.

The cited portion teaches that a global gateway is primarily responsible for a particular mobile unit or subset of mobile units. Col 8, lines 64-65. Because a single global gateway may become a bottleneck if it is simultaneously managing many mobile unit sessions, several global gateways may be used. However, the several global gateways partition the set of all mobile units into disjoint subsets. Because there is no overlapping of mobile unit to global gateway assignments, each request is automatically routed to the global gateway responsible for that particular mobile unit. Therefore, while Perkins might be responsive to the physical mobile unit itself, it is not responsive to “user log-in information.” Regardless, claim 5 depends from claim 1.

As to dependent claims 2, 5, 13, 51, 53-56, 58-61, 63-67 the argument set forth above is equally applicable here. The base claims being allowable, the dependent claims must also be allowable. Applicants respectfully request that the rejection of claims based on Perkins be withdrawn.

The First 35 U.S.C. §103 Rejection

Claims 3, 23, 28, 47, 57, and 62 stand rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Perkins in view of Holt et al. (U.S. Patent No. 6,070,192). Claim 3 depends from claim 1; claim 23 depends from claim 21; claim 28 depends from claim 26; and claims 47, 57 and 62 depend from claim 45. The argument set forth above is equally applicable here. The base claims being allowable, the dependent claims must also be allowable. Applicants respectfully request that the rejection of claims based on Perkins and Holt be withdrawn.

The Second 35 U.S.C. §103 Rejection

Claims 4, 24, and 48 stand rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Perkins in view of Holt as applied to the claims listed above, and further in view of Inoue et al. (U.S. Pat. No. 6,442,616).

Claim 4 depends from claim 1; claim 24 depends from claim 26; and claim 48 depends from claim 45. The argument set forth above is equally applicable here. The base claims being allowable, the dependent claims must also be allowable. Applicants respectfully request that the rejection of claims based on Perkins, Holt and Inoue be withdrawn.

The Third 35 U.S.C. §103 Rejection

Claims 22, 27, 46, and 50 stand rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Perkins in view of Holt as applied to the claims above, and

further in view of Reid et al. (U.S. Pat. No. 6,233,616). These rejections are respectfully traversed.

Claim 22 depends from claim 21; claim 27 depends from claim 26; and claims 46 and 50 depend from claim 45. The argument set forth above is equally applicable here. The base claims being allowable, the dependent claims must also be allowable. Applicants respectfully request that the rejection of claims based on Perkins, Holt and Reid be withdrawn.

In view of the foregoing, it is respectfully asserted that claims 3-4, 22-24, 27-28, 46-48, 50, 57, and 62 are now in condition for allowance.

Conclusion

It is believed that this Amendment places the above-identified patent application into condition for allowance. Early favorable consideration of this Amendment is earnestly solicited.

If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,
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Dated: July 8, 2004

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